Comment on GN 25-133

RE: Delete 2.1033 (a),(c) and (f).
RE: Make all exhibit requirements for certification available in one place.

Delete 2.1033(a). With the advent and full responsibility of equipment authorization resting in the hands of TCBs, in coordination with FCC OET, the filing of a form 731 application is no longer necessary by the manufacturer. Each TCB has the effective replication of the form 731, which is required to be submitted to the TCB, therefore the requirement for submitting form 731 in 2.1033(a) is completely unnecessary.

Delete 2.1033(c). When radiocommunications devices were mostly analog, the necessity of differentiating between unlicensed and licensed devices we appropriate. Modern technology is rarely analog and more often are licensed devices combined with unlicensed devices. 2.1033(c)(7), list of emissions types is required to be listed on the TCB's application form and therefore is not necessary to request separately. 2.1033(c)(9), range of power values is already subject to the requirements of the 'operational description' document and therefore not necessary to request separately; better to simply combine this item with the operational description documentation requirements. 2.1033(c)(10), maximum power rating is again required to be included in the operational description and therefore is not necessary to request separately. 2.1033(c)(11), DC voltages and currents was a reasonable request for analog, tube-type technology, however has lost significance in modern designs. Since this item is no longer relevant, it is better to simply remove it. The remaining requirements in 2.1033(c)(1) – (17) are identical, for all practical purposes, to those already required for unlicensed devices.

For the remaining items in 2.1033(c), those could be merged as separate requirements for specified rule parts into one list of required documentation.

Delete 2.1033(f). The updates to FCC policy now requires RF exposure exhibit for all application filings and therefore does not need to be listed in its own section. It would be more concise use of text to simply add this to the list of required exhibits.

Delete Hardcopy requirement. With regard to 2.1033 et. seq. requirements, the rules should delete the mandatory requirements to provide printed hardcopy photos; digital photos of sufficient quality should be the new modern requirement.

Consolidate all required exhibits in one place for transparency. There are currently several letters or requirements listed in various locations spread throughout the FCC rules (e.g. 15.212, KDB 594280 software security requirements). To maintain consistency and provide public transparency, all other written letters, documentation requirements and other exhibits relating to applications for equipment certification should be deleted from current location and concisely listed in 2.1033.

Respectfully submitted,
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